

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, As representative of THE COMMONWEALTH OF PUERTO RICO, et al, Debtor ¹	PROMESA Title III No. 17-BK 3283-LTS (Jointly Administrated)
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MOTION TO INFORM APPEARANCE AT OMNIBUS HEARING SCHEDULED
FOR JUNE 3, 2020

TO THE HONORABLE COURT:

PLEASE TAKE NOTICE that, pursuant to this Court's Setting Procedures For June 3, 2020 Hearing [Dkt. No. 13220], counsel for Windmar Renewable Energy, Inc. ("Windmar") hereby respectfully states as follows:

1. Fernando E. Agrait will appear on behalf of Windmar at the June 3, 2020 Omnibus Hearing ("Hearing") via telephonic appearance through the Court Solutions link, and, to the extent necessary, present argument.

2. At this time, counsel for Windmar will present arguments regarding Urgent Motion For Entry Of An Order Authorizing PREPA To Assume Certain

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's Federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 04780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Contracts With Ecoeléctrica, L.P. and Gas Natural Aprovevisionamientos SDG, S.A. [Docket No. 1951], on behalf of PREPA. However, because the Agenda for the Hearing has not yet been filed, Windmar reserve the right to present argument at the Hearing concerning any of the matters set forth in the Agenda that may impact Windmar's rights.

3. In the event, there is a matter included in the Agenda that requires argument from Windmar, an amended motion will be filed consistent with the Hearing Procedures Order.

4. Counsel will be prepared to respond to any matters raised by the Court or to any statements made by any party in connection with the above-captioned Title III proceedings or any adversary proceedings currently pending in the above-captioned Title III proceedings.

WHEREFORE, Windmar respectfully request that the Court take notice of the above stated.

WE HEREBY CERTIFY that on this same date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all participants and Standard Parties. A courtesy copy of this Motion will be delivered to the Court by email to SwainDPRCorresp@nysd.uscourts.gov as provided in First Amended Standing Order.

In San Juan, Puerto Rico, this 1st day of June 2020.

s/FERNANDO E. AGRAIT
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